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January 24, 2019

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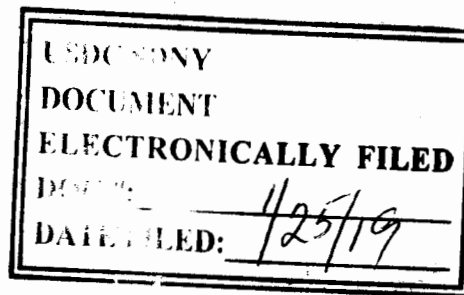
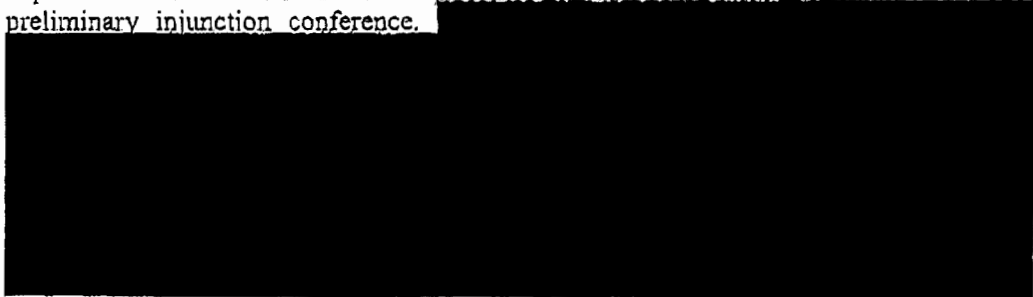
The Honorable Victor Marrero
United States District Judge
United States Courthouse
500 Pearl Street, Suite 1040
New York, NY 10007

Re: Coventry Capital v. EEA Life Settlements Inc., No. 17-cv-07417

Dear Judge Marrero:

We represent Defendant EEA Life Settlements, Inc. ("EEA Inc.") in the above referenced matter and write in response to the letter of Plaintiff Coventry Capital US LLC ("Coventry"), dated January 22, 2019. The January 22 letter contains several factual inaccuracies.

During the conference with Your Honor on January 15, 2019, and while there remains an issue as to whether the Court currently has jurisdiction given Coventry's filing of a notice of appeal, EEA Inc. represented that it would consider entering into a stipulation with Coventry aimed at mooted Coventry's request to reconsider the December 17, 2018 preliminary injunction order (the "PI Order") and its appeal. Following that conference and a subsequent call with Coventry's counsel, Coventry sent EEA Inc. a draft stipulation requiring EEA Inc. to retain at least 32 percent of any potential gross sale proceeds not be used for any other purpose, including the payment of taxes, until a final judgment was rendered in this action and any appeals therefrom were complete - a clear and drastic departure from what EEA Inc. had represented to this Court during the October 19, 2018 preliminary injunction conference.



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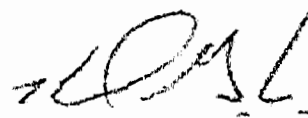
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Moreover, EEA Inc. notes that 32 percent of the net asset value of the Portfolio currently would amount to approximately \$50 million in assets, a sum that would be a high multiple of what Coventry ever could recover even assuming it had a viable claim.

What is more, despite Coventry's representation during the January 17, 2019 conference call with Your Honor that it would withdraw its January 16, 2019 Notice of Appeal should a stipulation be reached, a provision to that effect was not included in the stipulation itself, further preventing a mutually agreeable stipulation.


We appreciate the Court's continued attention to these matters and will be prepared to discuss them further at the Court's convenience.

Respectfully submitted,



Karl Geercken

cc: Counsel of Record

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by	
<u>EEA Life Settlements, Inc.</u>	
SO ORDERED.	
<u>1-24-19</u>	
DATE	VICTOR MARRERO, U.S.D.J.